

Jorge Alejandro Rojas
Rojas.jorge96@gmail.com
Plaintiff in Pro Se
557 Cambridge Way
Bolingbrook, IL 60440
(424) 219-1582

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JORGE ALEJANDRO ROJAS,

Plaintiff,

v.

UNPLUGGED MEDIA, LLC, et al,

Defendants.

Case No. 2:23-cv-02667-SPG-KS

District Judge Sherilyn Peace Garnett
Magistrate Judge Karen L. Stevenson

**REQUEST FOR CLERKS ENTRY OF
DEFAULT AS TO ALEX GOLD
HOLDINGS LLC**

Plaintiff, Jorge Alejandro Rojas, pursuant to Fed. R. Civ. P. 55(a), requests the Clerk make an Entry of Default against Defendant Alex Gold Holdings LLC (“AGH”).

Defendant AGH was served with the Second Amended Complaint (“SAC”) (Dkt. 59) on October 24, 2024. Dkt. 93. The service was conducted via the Nevada Secretary of State, pursuant to Nevada Revised Statute 14.030, which authorizes service via the Secretary of State in situations where the street address of the registered agent is not staffed. AGH, a Nevada entity, lists as its registered agent ALEXANDER BYKHOVSKY, located at 3064 KISHNER DR, 111, LAS VEGAS, NV, 89109. As described in the declaration of non service (Dkt. 92, p. 1), such address does not actually exist. Plaintiff attempted service on another address potentially used by ALEXANDER BYKHOVSKY, 3371 Rome St Apt 1 Las Vegas, NV 89169, which is listed to be BYKHOVSKY’s mailing address for

1 properties he owns in Nevada, but he was also not available there (Dkt. 92, p. 2). Although
2 BYKHOVSKY lists with this Court an address in Panama, it appears said address is also
3 not accessible, and the Court has received several return mailings for documents sent to
4 that address (Dkts. 78, 79, 89, 90, 91).

5 More than twenty one (21) days following service have elapsed. AGH is not an
6 infant, in the military, or incompetent, and has failed to plead or otherwise defend this
7 action. To date, Plaintiff has not been served with a copy of any responsive pleading to the
8 SAC.

9 Plaintiff requests the Clerk enter default against Defendant Alex Gold Holdings
10 LLC.

11 Respectfully submitted,

12 Dated: November 15, 2024.

13 /s/ Jorge Alejandro Rojas
14 Jorge Alejandro Rojas
15 Rojas.jorge96@gmail.com
16 Plaintiff in Pro Se
17 557 Cambridge Way
18 Bolingbrook, IL 60440
19 (424) 219-1582

20 **CERTIFICATE OF SERVICE**

21 A copy of this filing will be sent to each Defendants last known address and/or
22 registered agent via mail.

23 Dated: November 15, 2024.

24 /s/ Jorge Alejandro Rojas
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